

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF TENNESSEE
NORTHERN DIVISION**

IN RE:

REGAL PETROLEUM COMPANY, INC.

No. 3:16-bk-33660-SHB
CHAPTER 11

Debtor.

**APPLICATION OF DEBTOR TO EMPLOY KEITH L EDMISTON
AS ATTORNEY FOR THE DEBTOR**

NOTICE OF HEARING

Notice is hereby given that:

A hearing will be held on this matter on the **12th day of January, 2017 at 10:00 a.m.**, in Courtroom 1-C, located at the Howard H. Baker, Jr. U.S. Courthouse, 800 Market Street, Knoxville, TN 37902.

If you do not want the court to grant the relief requested, you or your attorney must attend this hearing. If you do not attend the hearing, the court may decide that you do not oppose the relief sought in the application and may enter an order granting that relief.

The Debtor, by and through counsel, moves this Honorable Court to approve Keith L. Edmiston ("Counsel") as its counsel in this case, *nunc pro tunc* to December 12, 2016.

In support of this Motion, the Debtor represents the following:

1. On the 12th day of December, 2016, the Debtor filed a voluntary petition under Chapter 11 of the Bankruptcy Code.
2. The Debtor seeks to employ Counsel as its attorney.

3. Counsel is duly admitted to practice in the United States Bankruptcy Court for the Eastern District of Tennessee.

4. The Debtor has selected Counsel because of his experience in matters such as this proceeding and believes he is well qualified to represent it in this proceeding.

5. The professional services to be rendered by Counsel include:

- a. giving the Debtor legal advice with respect to its powers and duties in the continued operation and management of its property and activities;
- b. preparing on behalf of the Debtor necessary applications, motions, answers, orders, reports, and other legal papers.
- c. making all necessary appearances in this Court on behalf of the Debtor;
- d. performing all other legal services for the Debtor which may be necessary.

6. It is necessary for the Debtor to employ attorneys for such professional services.

7. To the best of the Debtor's knowledge, Counsel does not hold any interest adverse to the estate and is a disinterested person within the meaning of 11 U.S.C. § 101(14).

8. The terms of the employment of Counsel agreed to by the Debtor, subject to the approval of the Court, is that Counsel will undertake this representation at his standard hourly rate for such matters. Counsel, presently designated to represent the Debtor, will charge \$250.00/hour.

9. The employment of Counsel under these terms and conditions will serve the best interests of the estate.

10. The Affidavit of Keith L. Edmiston is attached hereto as *Exhibit 1*.

WHEREFORE, the Debtor prays that its employment of Keith L. Edmiston under the terms and conditions set forth herein be approved, *nunc pro tunc* to December 12, 2016.

RESPECTFULLY SUBMITTED this 12th day of December, 2016.

/s/Keith L. Edmiston
Keith L. Edmiston
EDMISTON FOSTER
P. O. Box 30782
Knoxville, TN 37930
(865) 249-6038
keith.edmiston@edmistonfoster.com

CERTIFICATE OF SERVICE

The undersigned certifies that a true and correct copy of the foregoing Application has been served on the attorney for the U.S. Trustee, the Assistant U.S. Attorney for the Eastern District of Tennessee, the Internal Revenue Service, all parties requesting notice, all secured creditors, and all other creditors, all as identified below and in the manner indicated below, electronically via ECF or by first-class mail, properly addressed and proper postage prepaid, on this the 12th day of December, 2016:

/s/Keith L. Edmiston

U.S. Trustee
800 Market Street, Ste. 114
Knoxville, TN 37902
[ECF]

Internal Revenue Service
Centralized Insolvency Operations
PO Box 7346
Philadelphia, PA 19101-7346
[USM]

Kenny Saffles, Esq.
Office of the U.S. Attorney
800 Market St Ste 211
Knoxville, TN 37902-2342
[USM]

Knox County Trustee
PO Box 70
Knoxville, TN 37901-0070
[USM]

City of Knoxville
Revenue Enforcement
P. O. Box 1028
Knoxville, TN 37901-1028
[USM]

Internal Revenue Service
IRS Insolvency
801 Broadway
Nashville, TN 37203
[USM]

Kentucky Department of Revenue
501 High Street
Frankfort, KY 40601
[USM]

Peoples Bank of the South
106 W. Central Ave.
LaFollette, TN 37766
[USM]

Vinland Energy
2704 Old Rosebud Road
Ste. 320
Lexington, KY 40509
[USM]

Merchant Cash & Capital
460 Park Ave. 10Fl
New York, NY 10016
[USM]

Heil Trailer
3808 Bells Lane
Louisville, KY 40211
[USM]

Palmer Leasing
2575 Tobey Dr.
Indianapolis, IN 46219
[USM]

Post Trailer Repairs
1905 Sutherland Ave.
Knoxville, TN 37921
[USM]

Webb Trailer
P.O. Box 907
Catlettsburg, KY 41129
[USM]

Worldwide Equipment
107 WE Dr.
Prestonsburg, KY 41653
[USM]

First Volunteer Bank
728 Broad St.
Chattanooga, TN 37402
[USM]